

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re:) **20-13099**
)
DIRASHA JACKSON,) **Chapter 13**
)
Debtor.) **Hon. Judge: CLEARY**

NOTICE OF OBJECTION

To the following persons or entities who have been served via electronic mail:
U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Marilyn O. Marshall, Chapter 13 Trustee: courtdocs@chi13.com

To the following persons or entities who have been served via U.S. Mail:
Dirasha Jackson, 7516 S. Lafayette, Chicago, IL 60620
Illinois Department of Revenue, Bankruptcy Section, P.O. Box 19035, Springfield, IL 62794-9035
Kwame Raoul, Illinois Attorney General, 500 S. Second St., Springfield, IL 62701
Kwame Raoul, Illinois Attorney General, 100 W. Randolph St., Chicago, IL 60601

PLEASE TAKE NOTICE that on **December 7, 2020**, at **1:30 PM**, I will appear before the Honorable Judge **CLEARY**, or any judge sitting in that judge's place, and present the **Objection to Claim Number 6-1 (Illinois Department of Revenue)**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 122 6457** and the password is **Cleary644**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before November 3, 2020, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: November 3, 2020

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415

Attorney for the Debtor
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
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In Re:) **20-13099**
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Debtor.) **Hon. Judge: CLEARY**

OBJECTION TO CLAIM NO. 6-1 (ILLINOIS DEPARTMENT OF REVENUE)

NOW COMES the Debtor, **Dirasha Jackson**, by and through her attorneys, DAVID M. SIEGEL & ASSOCIATES, LLC, to present her Objection to Claim 6-1 (Illinois Department of Revenue), and in support thereof states as follows:

- 1) Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
- 2) The Debtor filed a Chapter 13 petition June 29, 2020. The confirmation of Debtor's Chapter 13 plan is still pending. Marilyn O. Marshall was appointed Trustee in this case.
- 3) The Debtor listed the Illinois Department of Revenue as one of her creditors.
- 4) On October 9, 2020, the Illinois Department of Revenue filed a proof of claim, Claim No. 6-1, on the Claims Register for taxes, divided into secured (\$158.05), unsecured, priority (\$1,359.69) and unsecured general (\$479.40), for a total amount of \$1,997.14. See Exhibit A.
- 5) Claim No. 6-1 contains \$663.52 as unsecured, priority for an unfiled 2019 tax return.
- 6) Sometime in May of 2020, the Debtor filed her 2019 return with the Illinois Department of Revenue, which shows she owes \$575.00. See Exhibit B.
- 7) On October 23, 2020, this office emailed Debtor's W2 forms and a signed copy of the 2019 return to the Illinois Department of Revenue's agent listed on the proof of claim, Christine Murphy.
- 8) As of today, the proof of claim has not been amended for the filed return.

9) As a result of the aforementioned, the claim filed by the Illinois Department of Revenue should be disallowed as to the 2019 amount of \$663.52, and replaced with \$575.00.

WHEREFORE, pursuant to 11 U.S.C. §502(a), the Debtor, **Dirasha Jackson**, respectfully requests that this honorable Court enter an order disallowing Claim No. 5-2 as to the 2019 amount and for such other and further relief as the Court shall deem proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415
Attorney for the Debtor

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